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FOR SERVICES RENDERED

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OSHA Ruling

- Met with the National Restaurant Association (NRA).
  - •• Although the ETS portion of the proposed rule will not be the majority of their comments, they agreed to comment and testify on the bad science used in the ETS portion of the proposed rule.
  - •• OSHA is attempting to force the employer to prove the absence of something that OSHA feels may be harmful,
  - •• The scope of the proposed rule will likely grow since OSHA is not specific as to how to regulate this aspect of the work place.
- Met with the American Hotel and Motel Association (AHMA).
  - •• The AHMA is more concerned about the IAQ portion of the proposed rule than the ETS portion.
  - •• Their new technical person seems to be excited about the proposed rule, but no one else really cares about it at this time. We will remain in close contact with this person.
  - •• They feel their members will have no problems complying with the rule.
  - •• We explained about the bad science used as the basis for the proposed rule, and the tenancy for OSHA's rules to expand to extreme circumstances. Their only response was that they were aware of OSHA's past rules.
- Met with the National Retail Federation (NRF).
  - •• They were in favor of submitting comments and possibly even testifying. However, both will stress the IAQ portion.

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- The NRF members are split on the ETS issue, therefore, they are looking at just leaving that portion of the rule out of their comments and testimony.

- We will be working closely with the person in charge of drafting the comments.

- Met with the Bed & Breakfast Association of Virginia.

  - The association is considering two strategies regarding this proposed rule.

    1. The Association can write comments and take a position on the proposed rule.

    2. The association can supply us with a mailing list and we can mail our information to all of their members and attempt to gain their support that way.

  - The Association is not overly concerned with the ETS portion of the rule because they do not think it will apply to them since they have no employees, and their establishments are actually connected to their residences.

- Met with the National Club Association (NCA).

  - The membership of the Association is not presently interested in the OSHA's proposed rule.

  - Our contact agreed that it is a very serious matter and that their members would not be exempt from the regulation.

  - After we explained to her the bad science involved in the regulation, she agreed that comments would probably be submitted by her organization.

- Follow-up meeting with the NCA.

  - Their members are not yet complaining and therefore, they are not getting too excited about this proposed rule.

  - At this point, it appears that NCA will submit comments, and these comments will focus somewhat on ETS. However, the ETS arguments will not be the major thrust of their comments.

- Met with the Small Business Administration (SBA) Office of Advocacy.

  - The meeting was sponsored by the SBA Office of Advocacy at the request of some groups in town regarding OSHA's proposed IAQ rule.

Source: https://www.industrydocuments.ucsf.edu/docs/zpvk0000

- •• The goal of attending this meeting was to determine the general attitude to OSHA's proposed rule and to expand our network with regards to both comments and testimony.

- •• The following points were made at the meeting.

    1. OSHA is attempting to shift the burden of proof to the employers and away from both OSHA and the employees.

    2. This rule is the first of many rules that OSHA will attempt to impose on the business community.

- Met with the International Military Community Executive Association (IMCEA).

    - •• The Executive Director, Mr. Paul Reece, was reluctant to comment on the proposed OSHA rule unless the Department of Defense (DOD) comments first.

    - •• We were informed that there are anti-smoking elements within the Secretary of Defense community (Health Directorate) that would love to ban smoking if given the chance; such as if we continue to press on this issue.

    - •• The meeting was still very productive because we obtained the names of all Service and DOD contacts, as well as the name of another club association, The Club Managers Association of America.

- Meeting regarding the strategy behind the Hospitality Industry Task Force.

- Reviewed the draft comments that were sent to the Bed & Breakfast Association of Virginia.

- Held a discussion with an OSHA attorney overseeing the IAQ project regarding the IAQ proposed rule.

- Held a discussion with the technical services person at the American Hotel and Motel Association regarding the breadth of the proposed rule.

- Went to the OSHA docket room to obtain information on the current state of the IAQ record. Wrote a memo detailing the findings.

- Reviewed H.R. 2919, EPA's foothold in the workplace.

- Worked on a summary of the Hospitality Industry meetings.

- Worked on finding a health scientist for the Hospitality Industry Task Force.

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- Mailed pertinent information to the Bed & Breakfast Association of Virginia.
- Drafted a summary memo of the Fontham study.
- Worked on the papers to hand out at the meetings with organizations representing the hospitality industry.
- Reviewed the NPRM in preparation for upcoming meetings in order to address the unique concerns of each organization.
- Held discussions regarding the above meetings to determine our position with these groups.
- Wrote a memo detailing R.J. Reynold's activities in the hospitality industry arena.
- Reviewed background materials on ventilation systems and point source controls.
- Wrote position and explanatory papers regarding the formation of a Hospitality Industry Task Force.

Total Professional Services	$20,000
TOTAL DUE	***$20,000***

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